

**Federal Defenders
OF NEW YORK, INC. MEMO ENDORSED**

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April 8, 2022

BY ECF AND BY EMAIL

The Honorable Kenneth M. Karas
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Christina Green*, 16cr0758-KMK

Dear Judge Karas:

I write regarding the above captioned matter and to request early termination of Christina Green's five-year term of supervised release, which began on or about March 25, 2019. Ms. Green moves for early termination pursuant to FED. R. CRIM. P. 32.1, 18 U.S.C. §§ 3583(e)(1), 3553(a), and all other applicable statutes, case law and local rules. As of today, Ms. Green has completed three years and fourteen days of her supervised release term. Ms. Green's motion for early termination is prompted by her work needs.

Ms. Green is employed by the New York City Health Justice Network (HJN), which is funded by the Criminal Justice Investment Initiative of the Manhattan District Attorney's office and overseen by the New York City Department of Health and Mental Hygiene. Exhibit A.

HJN offers voluntary, wrap-around health and social services to persons with CLSI, including trauma and resiliency-informed approaches to engagement in healthcare and reentry support services. Community health workers (CHWs) with lived experience of the criminal legal system are paired with participants recently released from incarceration. CHWs, embedded in community-based health and social service organizations, work with participants to identify and address needs by linking them to healthcare and social services and serve as trusted mentors, peers, and coaches along the way.

Id. Ms. Green started as a CHW with HJN in May 2019 when the program began. Exhibit B (September 24, 2021 letter from Andrea Yaffe, Director of the Center for Trauma Innovation, Exodus Transitional Community). Ms. Green excelled in her position "and was promoted to the CHW Supervisor within six months." Id. Thereafter, "due to her responsibility, leadership and

determination she replaced [Ms. Yaffe] as the [Program] Director earlier this year.” Id. Ms. Yaffe’s letter details Ms. Green’s work with HJN and her dedication to the program and its clients. Ms. Yaffe opines that Ms. Green’s “Ms. Green’s position in leadership has directly contributed to the successful reentry of many individuals returning home from jail or prison.” Id.; see also Exhibit C (letter from Anibal Cortes, who works for the Bureau of Health Promotion for Justice-Impacted Populations in the New York City Department of Health and Mental Hygiene, discussing Ms. Green’s positive impact on clients and rising through the ranks of HJN).¹

Ms. Green’s ability to perform certain work duties and work with certain HJN clients, however, is impacted by her federal supervised release status. Ms. Yaffe explains the issue as follows.

Unfortunately, due to her community supervision Ms. Green has had limited access to some facilities which would be an asset in her position and in connecting individuals with connection to support prior to their release. It is ra[re] that individuals with justice involvement hold leadership positions of this caliber and it would be monumental that she could connect to people that are still incarcerated to begin their reentry goals.

Id.; see also Exhibit E (letter from Mari Carlesimo, who works for the City of New York as Senior Director of Transitions to Community, explaining that “Ms. Green’s community supervision does impact her HJN work. Ms. Green has limited access to incarceration facilities where the program could connect with individuals prior to their release. In the same way the we forge partnerships with community-based reentry organizations, we also need to forge partnerships with incarceration facilities. Ms. Green’s ability to do that is hindered at this point.”)

Ms. Green has managed her time extraordinarily well while on supervision. In addition to her work for HJN, she attended and completed a number of educational programs, including the John Jay College of Criminal Justice’s Collective Leadership Supervisor Training program in the Winter of 2020. Exhibit F.

In addition to work and attending classes, Ms. Green also attends sex-offender treatment at Empire State Forensics since December 2019 and has been engaged and forthcoming. Exhibit G (email from Gretchen T. Sofocleous, Ph.D., Empire State Forensics). According to Dr. Sofocleous, Ms. Green “demonstrates significant guilt and remorse for her crime and the impact on her daughter and family.

¹ Two additional letters are attached as Exhibit D. These are from Elizabeth Gaynes, Chief Executive Officer and President of the Osborne Association, and Susan Gottesfeld, Chief Program Officer and Executive Vice President of the Osborne Association. Osborne is a critical agency as it relates to HJN. “CHWs [within HJN] are embedded in three well-established community organizations” including the Osborne Association. Exhibit A. As the letters indicate, Osborne is the particular agency group that hired Ms. Green (Ms. Gaynes indicates “we” hired Ms. Green). As such, both Ms. Gaynes and Ms. Gottesfeld are informed with regard to Ms. Green’s work for their agency and her participation in the program as a patient.

Since the beginning of treatment Ms. Green has demonstrated motivation to understand what contributed to acting out sexually, and moving forward with her life in a pro-social, healthy, and safe way.” Id. Even if supervised release is terminated early, Ms. Green plans to continue with treatment Empire and will continue attending treatment sessions with Dr. Sofocleous. Ms. Green understands that her recovery is a process. As such, she understands the importance of continuing with what has provided her with stability and success to date during supervised release. Ms. Green has been proactive in this regard and communicated with Dr. Sofocleous about remaining an Empire patient. Dr. Sofocleous confirmed her willingness to continue working with Ms. Green going forward even if supervised release ends. Id.

In this vein, Ms. Green plans to continue engaging in her other ongoing forms of treatment and communicating with her own community support network. She will continue attending her Narcotics Anonymous groups. Relatedly, her sponsor will remain an available resource for Mr. Green. Exhibit H (March 17, 2022 letter from Dorian Bess). Ms. Green will continue to communicate with members of her community support network and church, which have been invaluable to her in times of stress. Attached letter demonstrate the support within this community. See Exhibit I (letters of support). Finally, Ms. Green will continue with her day to day work within the re-entry landscape (as a Recovery Coach and Peer Support Specialist), which means that she will be surrounded by colleagues and professionals willing to assist her if and when needed.

I have spoken several times with United States Probation Officer Courtney Cooke, who supervises Ms. Green. In mid-February 2022, Mr. Cooke informed me that Ms. Green has done very well on supervision, recently passed her polygraph, and is moving forward in the right direction. At that time, Mr. Cooke informed me that he did not oppose Ms. Green’s request for early termination of supervised release. I spoke with Mr. Cooke as recently as yesterday, April 7, 2022, and he again confirmed that nothing has changed with regard to her positive performance on supervision. Mr. Cooke informed me that he performed a home visit with Ms. Green on April 7, 2022, and confirmed that she continues to do well. Mr. Cooke informed me that he still does not oppose Ms. Green’s request for early termination of supervised release.

I have spoken with Assistant United States Attorney Jason Swergold about the instant request. The government takes no position on Ms. Green’s request for early termination of supervised release.

For the foregoing reasons, Ms. Green respectfully requests that the Court grant her motion to terminate supervised release early.

Respectfully submitted,

JASON I. SER

cc: AUSA Jason Swergold
USPO Courtney Cooke

Granted.

So Ordered.

4/8/22